## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE **GREENEVILLE DIVISION**

B.P., H.A., and S.H. individually, and On behalf of all others similarly situated,

Plaintiffs,

No: 2:23-cv-00071-TRM-JEM v. CITY OF JOHNSON CITY, TENNESSEE, et al., Defendants.

## PLAINTIFFS' NOTICE OF MANUAL FILING

Plaintiffs manually filed the following exhibit to Plaintiffs' Opposition to Kevin Peters' Motion to Quash and for Protective Order (ECF 310).

1. Exhibit 12 – video recording

Plaintiffs sent a thumb drive containing this exhibit to 220 West Depot Street, Suite 200

Greeneville, TN 37743, via USPS Certified Mail, on September 18, 2024.

Dated September 18, 2024. Respectfully submitted,

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones (pro hac vice) Advocates for Survivors of Abuse PC 4200 Park Boulevard No. 413 Oakland, CA 94602 510-500-9634 vanessa@advocatesforsurvivors.com

/s/ Heather Moore Collins

Heather Moore Collins (# 026099) Ashley Shoemaker Walter (#037651) HMC Civil Rights Law, PLLC 7000 Executive Center Dr., Suite 320 Brentwood, TN 37027

615-724-1996 615-691-7019 FAX heather@hmccivilrights.com ashley@hmccivilrights.com

## /s/ Elizabeth A. Kramer

Elizabeth A. Kramer (pro hac vice)
Kevin M. Osborne (pro hac vice)
Julie C. Erickson (pro hac vice)
Erickson Kramer Osborne LLP
44 Tehama St.
San Francisco, CA 94105
415-635-0631
elizabeth@eko.law
kevin@eko.law
julie@eko.law

Attorneys for Plaintiffs and the Proposed Classes

## **CERTIFICATE OF SERVICE**

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on September 18, 2024 to counsel of record:

K. Erickson Herrin

HERRIN, McPEAK & ASSOCIATES

515 East Unaka Avenue

P. O. Box 629

Johnson City, TN 37605-0629

Email: rachel@hbm-lawfirm.com

Emily C. Taylor Reid Spaulding

WATSON, ROACH, BATSON &

LAUDERBACK, P.L.C.

P.O. Box 131

Knoxville, TN 37901-0131

etaylor@watsonroach.com

mashburn@watsonroach.com

Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, and Investigator Toma

Sparks, in his official capacity

Jonathan P. Lakey

Burch, Porter, & Johnson, PLLC

130 N. Court Ave.

Memphis, TN 38103

901-524-5000

jlakey@bpjlaw.com

mchrisman@bpjlaw.com

Attorney to Defendant City of Johnson City,

*Tennessee* 

Daniel H. Rader III

Daniel H. Rader IV

MOORE, RADER & YORK PC

46 N. Jefferson Avenue

P.O. Box 3347

Cookeville, TN 38502-3347

danrader@moorerader.com

danny@moorerader.com

Counsel for Kevin Peters in his individual

capacity

Kristin Ellis Berexa

Ben C. Allen

FARRAR BATES BEREXA

12 Cadillac Drive, Suite 480

Brentwood, TN 37027-5366

kberexa@fbb.law

ballen@fbb.law

Counsel for Toma Sparks in his individual

capacity

Keith H. Grant

Laura Beth Rufolo

Robinson, Smith & Wells, PLLC

633 Chestnut Street, Suite 700

Chattanooga, TN 37450

kgrant@rswlaw.com

lrufolo@rswlaw.com

awells@rswlaw.com

Counsel for Jeff Legault in his individual

capacity

/s Vanessa Baehr-Jones

Vanessa Baehr-Jones